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FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

NOV 06 2019

SEAN F. McAVOY, CLERK
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SPOKANE, WASHINGTON

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

v.

LUIS MANUEL FARIAS-CARDENAS,
JOSHUA ISAAC STINE
(a/k/a "Heat"),
PATRICK ELLIOTT PEARSON,
CRISTIAN MISAEL GOMEZ
(a/k/a "Flako"),
LUIS MANUEL RAMIREZ
(a/k/a "Sin"),
ZACARIAS MARTINEZ-GARZA
(a/k/a "Listo"),
NOE ANGEL GONZALEZ-MARTINEZ,
MARIANO RUIZ-BALDERAS
(a/k/a "Felix"),
JESSE LEON MANION, JR.,
HEATHER ELAINE KEATING,
LEONEL CABALLERO,
FORREST WALKER HERZOG,
AMY JO DYGERT,
RANDALL CURTIS GROSS,
MICHAEL EDWARD McLAUGHLIN,
JESUS VALENCIA-MORFIN,
GERARDO FARIAS-CONTRERAS
(a/k/a/ Tomas GOMEZ), and

No. 2:19-CR-00111-WFN

SUPERSEDING INDICTMENT

Vio.: 21 U.S.C. §§ 846, 841(a)(1),
(b)(1)(A)(viii), and (b)(1)(C)
Conspiracy to Distribute 500
Grams or More of a Mixture
or Substance Containing a
Detectable Amount of
Methamphetamine and a
Mixture or Substance
Containing a Detectable
Amount of Heroin (Count 1)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Distribution of 50 Grams or
More of Actual (Pure)
Methamphetamine
(Counts 2-5, 8, 12)

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of a Mixture or
Substance Containing
Methamphetamine (Counts
6, 7, 9, 11, 13, 15, 27)

1 ELICEO FARIAS-CARDENAS,

2 Defendants.

21 U.S.C. § 841(a)(1),
(b)(1)(C)
Distribution of a Mixture or
Substance Containing Heroin
(Counts 14-15, 27)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(i)
Possession with Intent to
Distribute 100 Grams or
More of a Mixture or
Substance Containing Heroin
(Count 16)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with Intent to
Distribute 500 Grams or
More of a Mixture or
Substance Containing
Methamphetamine
(Counts 17-18)

21 U.S.C. § 841(a)(1),
(b)(1)(A)(viii)
Possession with Intent to
Distribute 50 Grams or More
of Actual (Pure)
Methamphetamine
(Counts 19, 21)

21 U.S.C. § 841(a)(1),
(b)(1)(B)(viii)
Possession with Intent to
Distribute 5 Grams or More
of Actual (Pure)
Methamphetamine
(Count 20)

1 18 U.S.C. § 111(b)
2 Assault with Deadly Weapon
3 on Federal Law Enforcement
4 Officers (Counts 23-24)

5 18 U.S.C. § 924(c)(1)(A)(iii)
6 Discharge of a Firearm
7 During and in Relation to a
8 Crime of Violence
9 (Count 25)

10 18 U.S.C. §§ 922(g)(1),
11 924(a)(2)
12 Felon in Possession of a
13 Firearm (Counts 10, 22, 26)

14 21 U.S.C. § 853, 18 U.S.C.
15 § 924, 28 U.S.C. § 2461
16 Forfeiture Allegations

17 The Grand Jury charges:

18 COUNT 1

19 Beginning on a date unknown, but at least by on or about March 2015, and
20 continuing until on or about July 16, 2019, in the Eastern District of Washington and
21 elsewhere, the Defendants, LUIS MANUEL FARIAS-CARDENAS, JOSHUA
22 ISAAC STINE (a/k/a “Heat”), PATRICK ELLIOTT PEARSON, CRISTIAN
23 MISAEL GOMEZ (a/k/a/ “Flako”), LUIS MANUEL RAMIREZ (a/k/a “Sin”),
24 ZACARIAS MARTINEZ-GARZA (a/k/a “Listo”), NOE ANGEL GONZALEZ-
25 MARTINEZ, MARIANO RUIZ-BALDERAS (a/k/a “Felix”), JESSE LEON
26 MANION, JR., HEATHER ELAINE KEATING, LEONEL CABALLERO,
27 FORREST WALKER HERZOG, AMY JO DYGERT, RANDALL CURTIS GROSS,
28 MICHAEL EDWARD MCLAUGHLIN, JESUS VALENCIA-MORFIN, GERARDO
FARIAS-CONTRERAS (a/k/a/ Tomas GOMEZ), and ELICEO FARIAS-

1 CARDENAS, did knowingly and intentionally combine, conspire, confederate and
2 agree together with each other and with other persons, both known and unknown, to
3 commit the following offense against the United States: distribution of 500 grams or
4 more of a mixture or substance containing a detectable amount of methamphetamine,
5 a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1),
6 (b)(1)(A)(viii), or distribution of a mixture or substance containing a detectable amount
7 of heroin, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C), all in violation of 21 U.S.C.
8 § 846.

9 COUNT 2

10 On or about December 3, 2018, in the Eastern District of Washington, the
11 Defendants, JOSHUA ISAAC STINE (a/k/a “Heat”) and LUIS MANUEL RAMIREZ
12 (a/k/a “Sin”), knowingly and intentionally distributed 50 grams or more of actual
13 (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
14 § 841(a)(1), (b)(1)(A)(viii).

15 COUNT 3

16 On or about December 19, 2018, in the Eastern District of Washington, the
17 Defendant, JOSHUA ISAAC STINE (a/k/a “Heat”), knowingly and intentionally
18 distributed 50 grams or more of actual (pure) methamphetamine, a Schedule II
19 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

20 COUNT 4

21 On or about January 10, 2019, in the Eastern District of Washington, the
22 Defendant, JOSHUA ISAAC STINE (a/k/a “Heat”), knowingly and intentionally
23 distributed 50 grams or more of actual (pure) methamphetamine, a Schedule II
24 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

25 COUNT 5

26 On or about February 4, 2019, in the Eastern District of Washington, the
27 Defendant, JOSHUA ISAAC STINE (a/k/a “Heat”), knowingly and intentionally
28

1 distributed 50 grams or more of actual (pure) methamphetamine, a Schedule II
2 controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

3 COUNT 6

4 On or about February 28, 2019, in the Eastern District of Washington, the
5 Defendant, ZACARIAS MARTINEZ-GARZA (a/k/a “Listo”), knowingly and
6 intentionally distributed a mixture or substance containing a detectable amount of
7 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
8 § 841(a)(1), (b)(1)(C).

9 COUNT 7

10 On or about March 5, 2019, in the Eastern District of Washington, the
11 Defendant, CRISTIAN MISAEL GOMEZ (a/k/a/ “Flako”), knowingly and
12 intentionally distributed a mixture or substance containing a detectable amount of
13 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
14 § 841(a)(1), (b)(1)(C).

15 COUNT 8

16 On or about March 20, 2019, in the Eastern District of Washington, the
17 Defendants, JOSHUA ISAAC STINE (a/k/a “Heat”) and CRISTIAN MISAEL
18 GOMEZ, knowingly and intentionally distributed 50 grams or more of actual (pure)
19 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
20 § 841(a)(1), (b)(1)(A)(viii).

21 COUNT 9

22 On or about March 20, 2019, in the Eastern District of Washington, the
23 Defendant, CRISTIAN MISAEL GOMEZ (a/k/a/ “Flako”), knowingly and
24 intentionally distributed a mixture or substance containing a detectable amount of
25 methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C.
26 § 841(a)(1), (b)(1)(C).

COUNT 10

On or about March 31, 2019, in the Eastern District of Washington, the Defendant, CRISTIAN MISAEL GOMEZ (a/k/a/ "Flako"), knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, a firearm, to wit: a Smith & Wesson Model SW40F, .40 caliber semi-automatic handgun, bearing serial number PAB0760, which firearm had theretofore been transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

COUNT 11

On or about April 22, 2019, in the Eastern District of Washington, the Defendant, FORREST WALKER HERZOG, knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 12

On or about May 2, 2019, in the Eastern District of Washington, the Defendant, JOSHUA ISAAC STINE (a/k/a "Heat"), knowingly and intentionally distributed 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT 13

On or about May 2, 2019, in the Eastern District of Washington, the Defendant, ZACARIAS MARTINEZ-GARZA (a/k/a "Listo"), knowingly and intentionally distributed a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

COUNT 14

On or about July 1, 2019, in the Eastern District of Washington, the Defendant, RANDALL CURTIS GROSS, knowingly and intentionally distributed a mixture or

1 substance containing a detectable amount of heroin, a Schedule I controlled substance,
2 in violation of 21 U.S.C. § 841(a)(1), (b)(1)(C).

3 COUNT 15

4 On or about July 2, 2019, in the Eastern District of Washington, the Defendant,
5 RANDALL CURTIS GROSS, knowingly and intentionally distributed a mixture or
6 substance containing a detectable amount of methamphetamine, a Schedule II
7 controlled substance, and a mixture or substance containing a detectable amount of
8 heroin, a Schedule I controlled substance, all in violation of 21 U.S.C. § 841(a)(1),
9 (b)(1)(C).

10 COUNT 16

11 On or about July 16, 2019, in the Eastern District of Washington, the
12 Defendant, LUIS MANUEL FARIAS-CARDENAS, knowingly and intentionally
13 possessed with the intent to distribute 100 grams or more of a mixture or substance
14 containing a detectable amount of heroin, a Schedule I controlled substance, in
15 violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(i).

16 COUNT 17

17 On or about July 16, 2019, in the Eastern District of Washington, the
18 Defendant, JOSHUA ISAAC STINE (a/k/a "Heat"), knowingly and intentionally
19 possessed with the intent to distribute 500 grams or more of a mixture or substance
20 containing a detectable amount of methamphetamine, a Schedule II controlled
21 substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

22 COUNT 18

23 On or about July 16, 2019, in the Eastern District of Washington, the
24 Defendants, JESUS VALENCIA-MORFIN and GERARDO FARIAS-CONTRERAS
25 (a/k/a Tomas GOMEZ), knowingly and intentionally possessed with the intent to
26 distribute 500 grams or more of a mixture or substance containing a detectable amount
27 of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §
28 841(a)(1), (b)(1)(A)(viii).

COUNT 19

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, FORREST WALKER HERZOG, knowingly and intentionally possessed with the intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT 20

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, MARIANO RUIZ-BALDERAS (a/k/a “Felix”), knowingly and intentionally possessed with the intent to distribute 5 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(B)(viii).

COUNT 21

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, MICHAEL EDWARD McLAUGHLIN, knowingly and intentionally possessed with the intent to distribute 50 grams or more of actual (pure) methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a)(1), (b)(1)(A)(viii).

COUNT 22

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, JOSHUA ISAAC STINE (a/k/a “Heat”), knowing of his status as a person previously convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess in and affecting commerce, firearms, to wit:

- a Ruger New Model Blackhawk, .45 caliber revolver, bearing serial number 46-15779;
- a Manurhin S.A., Model PP, .32 caliber semi-automatic handgun, with an obliterated serial number;
- a Lorcin Engineering Model L22, .22 caliber semi-automatic handgun, bearing serial number 007824;

- 1 - a Haskell (MFRG) Model JS45, .45 caliber semi-automatic handgun,
2 bearing serial number 029435;
- 3 - a Zastava Model PAP, 7.62 caliber rifle, bearing serial number
4 ZAPAP1101932;
- 5 - a Kimber Model Ultra Covert II, .45 caliber semi-automatic handgun,
6 bearing serial number KU324858;
- 7 - a Taurus Model "Judge" revolver designed to fire .45 Long Colt or 410
8 shotgun ammunition, bearing serial number CM740365;
- 9 - a CZ (Ceska Zbrojovka) Model 70, 7.65 (.32) caliber semi-automatic
10 handgun, bearing serial number 703051;
- 11 - a Keltec (CNC Industries) Model P11, 9mm semi-automatic handgun,
12 bearing serial number AA3P33;
- 13 - a Ruger Model Blackhawk, .41 caliber revolver, bearing serial number 47-
14 87885;
- 15 - a Phoenix Arms Model HP22, .22 caliber semi-automatic handgun, with an
16 obliterated serial number;
- 17 - a Glock Model 19, 9mm caliber semi-automatic handgun, bearing serial
18 number BHFA669;
- 19 - a Hi-Point Model 995, 9mm caliber rifle, bearing serial number E9629B;
- 20 - a Mossberg Model 590, 12-gauge shotgun, bearing serial number V0745386;
- 21 - a Ruger Model AR-556, 5.56 caliber rifle, bearing serial number 854-16911;
- 22 - a Smith and Wesson Model M&P 15, .223 caliber rifle, bearing serial
23 number SP02452;
- 24 - a Ruger Model 22/45, .22 caliber semi-automatic handgun, bearing serial
25 number 224-12031;
- 26 - a Winchester Model 1300 "Defender", 12-gauge shotgun, bearing serial
27 number L3547975;
- 28 - a Seekins Precision Model SP15, .223 caliber rifle, bearing serial number
000548; and
- an HS Products (IM Metal) Model XD40, .40 caliber semi-automatic
handgun, bearing serial number S229985,

which firearms had theretofore been transported in interstate and foreign commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2)

COUNT 23

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, PATRICK ELLIOTT PEARSON, did intentionally and forcibly assault and inflict bodily injury upon A.B., a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, by means and use of a deadly and dangerous weapon, to wit: a Sun City Machinery Stevens 320 12-gauge pump action shotgun, bearing serial number 121111S, while A.B. was engaged in and on account of, the performance of his official duties, in violation of 18 U.S.C. § 111(b).

COUNT 24

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, PATRICK ELLIOTT PEARSON, did intentionally and forcibly assault and inflict bodily injury upon B.R., a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives, by means and use of a deadly and dangerous weapon, to wit: a Sun City Machinery Stevens 320 12-gauge pump action shotgun, bearing serial number 121111S, while B.R. was engaged in and on account of, the performance of his official duties, in violation of 18 U.S.C. § 111(b).

COUNT 25

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, PATRICK ELLIOTT PEARSON, did knowingly discharge and use a firearm, to wit: a Sun City Machinery Stevens 320 12-gauge pump action shotgun, bearing serial number 121111S, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, to wit: Assault with a Deadly Weapon on a Federal Law Enforcement Officer, in violation of 18 U.S.C. § 111(b), as charged in Count 23 and Count 24 of this Superseding Indictment, all in violation of 18 U.S.C. § 924(c)(1)(A)(iii).

COUNT 26

On or about July 16, 2019, in the Eastern District of Washington, the Defendant, PATRICK ELLIOTT PEARSON, knowing of his status as a person

1 previously convicted of a crime punishable by imprisonment for a term exceeding one
 2 year, did knowingly possess in and affecting commerce, a firearm, to wit: a Sun City
 3 Machinery Stevens 320, 12-gauge pump action shotgun, bearing serial number
 4 121111S, which firearm had theretofore been transported in interstate and foreign
 5 commerce, in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2).

6 COUNT 27

7 On or about October 23, 2019, in the Eastern District of Washington, the
 8 Defendant, ELICEO FARIAS-CARDENAS, knowingly and intentionally distributed
 9 a mixture or substance containing a detectable amount of methamphetamine, a
 10 Schedule II controlled substance, and a mixture or substance containing a detectable
 11 amount of heroin, a Schedule I controlled substance, all in violation of 21 U.S.C. §
 12 841(a)(1), (b)(1)(C).

13 NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS

14 The allegations contained in this Superseding Indictment are hereby re-alleged and
 15 incorporated by reference for the purpose of alleging forfeitures.

16 Controlled Substance Forfeitures

17 Pursuant to 21 U.S.C. § 853, upon conviction of a controlled substance
 18 offense(s), in violation of 21 U.S.C. § 841, as set forth in Counts 1-9, 11-21, and 27,
 19 of this Superseding Indictment, the Defendants, LUIS MANUEL FARIAS-
 20 CARDENAS, JOSHUA ISAAC STINE (a/k/a “Heat”), PATRICK ELLIOTT
 21 PEARSON, CRISTIAN MISAEL GOMEZ (a/k/a “Flako”), LUIS MANUEL
 22 RAMIREZ (a/k/a “Sin”), ZACARIAS MARTINEZ-GARZA (a/k/a “Listo”), NOE
 23 ANGEL GONZALEZ-MARTINEZ, MARIANO RUIZ-BALDERAS (a/k/a “Felix”),
 24 JESSE LEON MANION, JR., HEATHER ELAINE KEATING, LEONEL
 25 CABALLERO, FORREST WALKER HERZOG, AMY JO DYGERT, RANDALL
 26 CURTIS GROSS, MICHAEL EDWARD McLAUGHLIN, JESUS VALENCIA-
 27 MORFIN, GERARDO FARIAS-CONTRERAS (a/k/a/ Tomas GOMEZ), and
 28 ELICEO FARIAS-CARDENAS, shall forfeit to the United States of America, any

1 property constituting, or derived from, any proceeds obtained, directly or indirectly, as
2 the result of such offense(s) and any property used or intended to be used, in any
3 manner or part, to commit or to facilitate the commission of the offense.

4 The property to be forfeited includes, but is not limited to:

5 LUIS MANUEL FARIAS-CARDENAS (Count 1)

6 U.S. CURRENCY

7 \$6,378.00 U.S. currency seized on July 16, 2019, by the United
8 States Drug Enforcement Administration pursuant to the
9 execution of a federal search and seizure warrant.

10 REAL PROPERTY

11 1. The real property being forfeited is commonly known as Parcel #:

12 121145000, Moses Lake, Washington, described as follows:

13 All that lot or parcel of land, together with its buildings,
14 appurtenances, improvements, fixtures, attachments and
15 easements, known as Parcel #: 121145000, Moses Lake,
16 Washington, legally described as follows:

17 LOTS 1 TO 3 BLOCK 2 WHEELER

18 Tax Parcel No. 121145000

19 2. The real property being forfeited is commonly known as Parcel #:

20 121146000, Moses Lake, Washington, described as follows:

21 All that lot or parcel of land, together with its buildings,
22 appurtenances, improvements, fixtures, attachments and
23 easements, known as Parcel #: 121146000, Moses Lake,
24 Washington, legally described as follows:

25 LOT 4 BLOCK 2 WHEELER

26 Tax Parcel No. 121146000
27
28

3. The real property being forfeited is commonly known as 14929 NE 4th Street, Moses Lake, Washington, described as follows:

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, known as 14929 NE 4th Street, Moses Lake, Washington, legally described as follows:

LOTS 5 & 6 BLOCK 2 WHEELER

Tax Parcel Nos. 121147000 and 600437000

4. The real property being forfeited is commonly known as 1912 West Atkinson Road, Moses Lake, Washington, described as follows:

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 1912 West Atkinson Road, Moses Lake, Washington, legally described as follows:

TAX #307 IN FU 222, BLK 49, Described as follows: Beginning at the corner of FU 222, thence S52°27'E along the SWly boundary of FU 25.3'; thence S57°25'E 109.1'; thence S57°24'30"E 241' to the TPOB; thence N32°35'30"E 315'; thence S57°24'30"E 155'; thence S32°35'30"W 348', more or less, to the SWly boundary of said FU222; thence N40°42'10"W 114.84'; thence N57°24'30"W 45' to the TPOB. Containing 1.16 Acres, more or less.

Tax Parcel No. 2100492220300

5. The real property being forfeited is commonly known as 798 South Thacker Road, Othello, Washington, described as follows:

All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 798 South Thacker Road, Othello, Washington, legally described as follows:

TAX #118 IN FU 76, BLK 49 LYING W. OF THACKER ROAD, Described as follows: that ptn of FU 76, Blk 49 as shown on the 7th revision of final plat, lying in the S1/2 of 8-15-29. Beginning at the SW corner of said FU; thence N0°36'10"W along the West

boundary of said Unit 100'; thence N71°45'E 591', more or less, to the centerline of the county road known as Thacker Rd; thence SEly along said centerline 303', more or less, to the South line of said section; thence Wly along said South line 675'; more or less, to the point of beginning.

Tax Parcel No. 2100490760400

GERARDO FARIAS-CONTRERAS (a/k/a/ Tomas GOMEZ)
(Counts 1 and 18)

U.S. CURRENCY

\$13,001.00 U.S. currency seized on July 16, 2019, by the United States Drug Enforcement Administration pursuant to the execution of a federal search and seizure warrant.

If any forfeitable property, as a result of any act or omission of the Defendant(s):

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p).

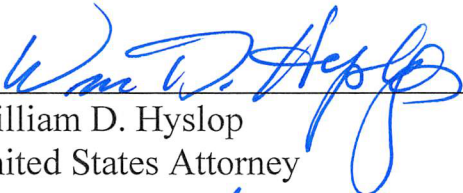
Firearm Forfeitures

Pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461(c), upon conviction of a firearm offense(s) in violation of 18 U.S.C. §§ 922(g)(1), 924(a)(2), as set forth in Counts 10, 22 and 26; and in violation of 18 U.S.C. § 924(c)(1)(a)(iii), as set forth in Count 25 of this Superseding Indictment, the Defendants JOSHUA ISAAC STINE (Count 22), PATRICK ELLIOTT PEARSON (Counts 25 and 26), , and CRISTIAN MISAEL GOMEZ (a/k/a/ "Flako") (Count 10), shall forfeit to the United States of

1 America, any firearms and ammunition involved or used in the commission of the
2 offense(s).

3 Dated: November 6, 2019.

4
5 A TRUE BILL

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9 
10 William D. Hyslop
11 United States Attorney

12 
13 Caitlin Baunsgard
14 Assistant United States Attorney